

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LUISA CALIXTO,

Plaintiff,

-against-

BALSAMO & ROSENBLATT, P.C., ROBERT
ROSENBLATT, EDWARD HALL, SERENAY TAYSIN,
266 REALTY NY LLC, HEUNG SAN TAM, and
JUSTICE McALLISTER, and A. BALSAMO &
ROSENBLATT, P.C.

Defendants.

Docket # 18-CV-04675

(MKB-SMG)

ANSWER TO AMENDED
COMPLAINT

JURY TRIAL DEMANDED

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Defendants, BALSAMO & ROSENBLATT, P.C., ROBERT ROSENBLATT,
EDWARD HALL, SERENAY TAYSIN and A. BALSAMO & ROSENBLATT, P.C.,
("Defendants"), by their attorneys, RIVKIN RADLER LLP, respectfully submit the
following upon information and belief as and for their Answer to Plaintiff's Amended
Complaint:

FIRST: Inasmuch as the Amended Complaint is, upon information and
belief, with the exception of paragraph 5 and the addition of A. BALSAMO &
ROSENBLATT, P.C., as a Defendant, and as acknowledged by Plaintiff's counsel on
June 5, 2019, substantively identical to the Complaint filed on August 17, 2018,
("Complaint"), the Defendants adopt and incorporate as if fully set forth herein the
responses to the allegations contained in the Answer to the Complaint.

SECOND: As for the allegation set forth in paragraph 5, Defendants admit
that a stipulation was entered into on behalf of Defendants, BALSAMO &

ROSENBLATT, P.C., ROBERT ROSENBLATT, EDWARD HALL, SERENAY TAYSIN, on April 26, 2019 and refer this Court and the trier of fact to the terms therein to the extent relevant to any issue to be tried in this action.

THIRD: To the extent necessary, Defendant A. BALSAMO & ROSENBLATT, P.C., adopts all prior representations made by Defendant, BALSAMO & ROSENBLATT, P.C., to this Court concerning the FDCPA claim for relief asserted by Plaintiff.

DATED: Uniondale, New York
June 12, 2019

Yours, etc.,

RIVKIN RADLER LLP
Attorneys for Defendants
BALSAMO & ROSENBLATT, P.C.,
ROBERT ROSENBLATT, EDWARD
HALL, SERENAY TAYSIN

By: /s/
Kenneth A. Novikoff (KAN - 0350)
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